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**Attorney for Debtor(s)**

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**UNITED STATES BANKRUPTCY COURT**  
**DISTRICT OF NEW JERSEY**

**IN RE:** : **CHAPTER 13**

**RUTH I. BAEZ** : **CASE NO.: 22-13330/JNP**

**Debtor(s)** : **CERTIFICATION OF ROBERT**  
: **OLIVAREZ, LANDLORD & OWNER**  
: **OF TRIPLE J'S, LLC, TO VACATE**  
: **THE AUTOMATIC STAY AS TO**  
: **DEBTOR'S RESIDENCE**

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**ROBERT OLIVAREZ**, being of full age, hereby certifies as follows:

1. I am the owner of Triple J's, LLC, and the residential landlord of the Debtor in the above referenced matter. As such, I have a full knowledge and understanding as to the facts at hand.

2. The Debtor has previously entered into a residential lease agreement with Triple J's, LLC, and thereafter fell substantially in arrears with regards to monthly rental payments. On the eve a landlord/tenant hearing as to eviction, the Debtor filed the above referenced bankruptcy case.

3. A proof of claim was filed for \$27,442.01 as to pre-petition rental arrears. Thereafter, a consent order was entered by this Court, on July 12, 2022, which stipulated the following:

a. The Debtor will resume regular rental payments as of August 1, 2022 with all

- payments being made by the 5<sup>th</sup> of each month.
- b. The Debtor will cure all pre-petition arrears within eighteen months of the petition date (by way of payments to the Chapter 13 Standing Trustee)
  - c. A thirty (30) day default clause as to both regular rental payments and payments to the Chapter 13 Standing Trustee
  - d. Debtor to make an immediate payment of \$254.16 to Maple Shade Township for water/sewer charges in accordance with the lease agreement.

4. The Debtor has failed to make either the August or September rental payments in direct violation of the previous consent order entered by this Court. It should further be noted that the Debtor has only made one (1) post-petition payment since case filing. The May and June 2022 payments were received from a New Jersey Rental Assistance Program (check for \$3,740.00 dated May 19, 2022) and credited towards the Debtor's post-petition rental obligations. In addition, New Jersey Rental Assistance Program paid \$600 (July 7, 2022) and \$300.00 (August 11, 2022)

5. The Debtor has only made one payment to the Chapter 13 Standing Trustee. The aforementioned payment, in the amount of \$3,280.00, was made on June 21, 2022. The Debtor has not made any payments since and is currently \$9,307.06 in arrears as to her confirmed Chapter 13 Plan.

6. The Debtor has not made the water/sewer payment to Maple Shade Township as previously stipulated with the consent order resolving Triple J's, LLC's objection to confirmation.

7. It is my belief and understanding that the Debtor has vacated the property. The property is in need of various repairs and there is great concern that additional damages will be

incurred unless immediate actions are taken. Trash and debris remain outside of the home and the yard is in need of proper attention to avoid fines/sanctions from the Township.

I hereby certify that all the foregoing statements made are true and correct to the best of my knowledge, information and belief. If any of the foregoing statements are found to be intentionally false, I understand that I am subject to punishment.

Dated: 9/6/2022 /s/ **ROBERT OLIVAREZ**  
**ROBERT OLIVAREZ, OWNER OF TRIPLE J'S ,LLC**